



IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

DR. JOYCE BROWN,	)	
	)	
Plaintiff,	)	
	)	
VS.	)	No. 3:10-0414
	)	JURY DEMAND
WAL-MART ASSOCIATES, INC.,	)	JUDGE TRAUGER
	)	MAGISTRATE JUDGE GRIFFIN
Defendant.	)	

**MOTION FOR ENTRY OF AGREED ORDER AND STIPULATION  
SUBSTITUTING WAL-MART STORES EAST, LP,  
AS THE PROPER DEFENDANT IN THIS MATTER**

Defendant moves the Court for entry of the attached agreed order and stipulation substituting Wal-Mart Stores East, LP, for Wal-Mart Associates, Inc., as the proper defendant in this matter.

This motion should be granted because Wal-Mart Stores East, LP, was the entity that operated the Wal-Mart retail stores at issue at the time of plaintiff's accident, not Wal-Mart Associates, Inc.

Further, the Court will retain jurisdiction because diversity of citizenship between the parties still exists. Wal-Mart Stores East, LP, is a Delaware limited partnership. WSE Management, LLC, a Delaware limited liability company, is the general partner, and WSE Investment, LLC, a Delaware limited liability company, is the limited partner. The sole member of WSE Management, LLC and WSE Investment, LLC is Wal-Mart Stores East, Inc., whose parent company is Wal-Mart Stores, Inc., a Delaware corporation.